

RECEIVED  
CENTRAL FAX CENTER  
JAN 08 2007

Remarks

Claims 1-5, 7-13, 15-20, 22, and 29-33 are pending. Claim 16 has been amended.

Claims 6, 14, 21, 23-28, and 34 have been previously cancelled. In the office action mailed August 8, 2006, the examiner rejected claims 1-3, 5, 7-8, 29-31 and 33 under 35 U.S.C. § 103(a) as being obvious over the combination of U.S. Patent No. 6,606,630 to Gunlock in view of U.S. Patent No. 6,931,440 to Blumenau et al (hereinafter Blumenau) and further in view of U.S. Patent Application Publication 2002/0083339 to Blumenau et al (hereinafter Blumenau et al). The examiner rejected claims 16-20 and 22 as being obvious over the combination of Gunlock and Blumenau in view of the further combination of U.S. Patent No. 6,665,714 to Blumenau et al (hereinafter Blumenau et al, 6,665,714). The examiner rejected claims 4, 9-13, 15, 26 and 32 under 35 U.S.C. § 103(a) as being obvious over the combination of Gunlock, Blumenau, and Blumenau et al in view of the further combination of U.S. Patent No. 6,665,714 to Blumenau et al (hereinafter Blumenau et al, 6,665,714).

**1. Rule 131 Declaration**

A declaration pursuant to 37 C.F.R. § 1.131 is filed with this Response showing that the pending claims were conceived before the filing date of Blumenau, et al (2002/0083339). Enclosed are the declarations of Roger Fulghum and Dale Duty, which demonstrate the present invention was conceived before the filing date of Blumenau et al. on December 22, 2000. the declarations also demonstrate that the applicants and their counsel were diligent with respect to constructively reducing the invention to practice from a time just prior to the December 22, 2000 to the filing date of this application on January 26, 2001. As such, Applicants request that Blumenau, et al be removed as a reference.

**2. All Claim Elements Must be Taught or Disclosed by the Combined References**

Applicants submit that a prima facie case of obviousness has not been established and that a rejection of the pending claims on obviousness grounds is improper. A prima facie case of obviousness requires a showing that all of the claim limitations of the rejected claims are taught or suggested by the prior art. Manual of Patent Examining Procedure 2143 and 2143.03. The establishment of a prima facie case of obviousness requires that *all* the claim limitations be taught or suggested by the prior art. MPEP 2143.01 (emphasis added). "All words of a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 U.S.P.Q. 494, 496 (CCPA 1970). Here, because all of the elements of the independent claims are not taught or suggested by the prior art combination identified by the examiner (Gunlock, Blumenau, Blumenau et al and Blumenau et al, 6,665,714), a prima facie case of obviousness cannot be established and the rejection of these claims should be withdrawn.

**3. Blumenau, et al. (2002/0083339) does not teach or suggest storing the unique hardware addresses of authorized target devices.**

Applicants have noted above that an affidavit has been filed to remove the Blumenau, et al (2002/0083339) reference as prior art. However, even if the Blumenau, et al reference was prior art, which Applicants do not contend, Blumenau, et al does not teach or suggest a required element all of the independent claims either alone or in combination with Blumenau and Gunlock. The element this combination lacks is a unique hardware address table which holds the unique hardware addresses of *target devices* that each respective host is *authorized* to access.

The Examiner acknowledges that Gunlock and Blumenau do not teach or suggest a unique hardware address table which stores the unique hardware addresses of authorized target

devices. (Office Action, p.4). The Examiner states that Blumenau et al teaches a centralized unique hardware address table. (Office Action, p.4) The cited portion of Blumenau et al, however, discusses filtering requests at a shared resource. (Blumenau et al, [0022]) No mention is made of a table containing unique hardware addresses, as required by the claims. Additionally, the Examiner states that Blumenau et al teaches wherein the unique hardware address table stores the unique hardware address of every target device that each respective host is authorized to access. (Office Action, p.4). The cited paragraphs in Blumenau et al, paragraphs 41, 44, and 45, do not teach or suggest a table storing unique hardware addresses of every *target* device that each host is authorized to access. Rather, Blumenau et al discusses a “master filter table” which “includes a record for each HBA that is logged into a port of the storage system and has at least one logical volume allocated thereto.” (Blumenau et al, [0044]). It is clear that the table in Blumenau et al does not contain the unique hardware addresses of *target* devices, but rather the hardware identifiers of host bus adapters. (Figure 5) Blumenau et al does not teach or suggest a table storing unique hardware addresses of every *target* device that each host is authorized to access. Thus, Blumenau et al does not cure the deficiency of Blumenau and Gunlock, and independent claims 1, 9, and 29 should be passed to issuance.

Additionally, independent claim 16 has been amended to clarify that the target devices stored in the unique hardware address table are devices which the host is *authorized* to access. The Examiner has acknowledged that Gunlock and Blumenau do not teach or suggest a unique hardware address table which stores the unique hardware addresses of authorized target devices. (Office Action, p.4). Additionally, Blumenau et al 6,665,714 does not cure this deficiency. The cited portion of Blumenau et al 6,665,714 does not teach or suggest storing addresses of target devices which the host is *authorized* to address. Thus, Blumenau et al

RECEIVED  
CENTRAL FAX CENTER

JAN 08 2007

6,665,714 does not cure the deficiency of Blumenau and Gunlock, and independent claim 16 should be passed to issuance.

**6. Claims 2-5, 7, 8, 10-13, 15, 17-20, 22, and 30-33**

Dependent claims 2-5, 7, 8, 10-13, 15, 17-20, 22, and 30-33 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim. Applicants submit that the rejection of claims 2-5, 7, 8, 10-13, 15, 17-20, 22, and 30-33 should be withdrawn.

**Conclusion**

Applicants respectfully submit that pending claims 1-5, 7-13, 15-20, 22, and 29-33 of the present invention are allowable. Applicants respectfully request that the rejection of these claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,

  
\_\_\_\_\_  
Roger Kulgham  
Registration No. 39,678

Baker Botts L.L.P.  
910 Louisiana  
One Shell Plaza  
Houston, Texas 77002-4995  
(713) 229-1707

Baker Botts Docket Number: 016295.0635

Date: January 8, 2007